

EXHIBIT A

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August 22, 2019

Robert Julian
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VIA EMAIL (korsini@cravath.com)

Kevin J. Orsini, Esq.
Cravath, Swaine & More LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019-7475

*Re: In re PG&E Corporation and Pacific Gas and Electric Company, Case No. 19-30088
(DM) (Jointly Administered)*

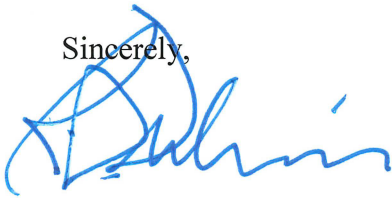
Dear Mr. Orsini:

During the hearing before Judge Montali on the Motion for Relief from Stay, the Debtors stated their intention to deny liability as to all of the fires that will be the subject of the estimation proceedings. We assume the broad based denial is grounded in good faith, based on the Debtors' analysis of the Cal Fire reports, investigation of the facts with their employees, and examination of the physical and documentary evidence in their possession, custody or control. Since the TCC and the fire victims have not had similar access to the evidence, and in order to meaningfully prepare for the hearing on August 27th, we request the Debtors provide the TCC and the Court in advance of the August 27th hearing with: (1) the factual and legal bases supporting their denial of liability for each fire (including any affirmative defenses); (2) the names of witnesses you contend will support PG&E's denial of liability; and (3) any documents and physical evidence which PG&E will rely upon to support their denials. We believe such disclosures are essential in order to assess the discovery necessary to meet the time frame for any estimation process. A set of standard contention interrogatories along this line are enclosed. We will separately follow up this letter with a request for the production of specific documents that we believe the Debtors should produce immediately in connection with this process.

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

Kevin J. Orsini
August 22, 2019
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Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Julian", with a stylized flourish at the end.

Robert Julian
Partner

Enclosure

cc: (Via Email):

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Gregory A. Bray
Frank M. Pitre
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Counsel to the Official Committee of Tort Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**FIRST SET OF INTERROGATORIES OF
THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS TO THE DEBTORS
PG&E CORPORATION AND PACIFIC
GAS AND ELECTRIC COMPANY**

OFFICIAL COMMITTEE OF TORT CLAIMANT'S COMMITTEE'S SECOND SET OF INTERROGATORIES UNDER FED. R. BANKR. 2004 TO DEBTORS

Pursuant to Fed. R. Bankr. P. 9014 and 7033 (FRCP 33), and Paragraph 37 of the Second Amended Order Implementing Certain Notice and Case Management Procedures, dated May 13, 2019 (Dkt No. 1996), the Official Committee of Tort Claimants (the "**TCC**"), by and through their attorneys, hereby serve the following interrogatories (the "**Interrogatories**") on PG&E Corporation and Pacific Gas and Electric Company (collectively, the "**Debtors**"), to be answered with written responses to the law offices of Baker & Hostetler LLP, 1160 Battery Street, Suite 100, San Francisco, CA 94111 within 7 days day after service upon the Debtors.

DEFINITIONS AND INSTRUCTIONS

1. "And/Or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

2. The terms "You" or "Your" means Debtor Pacific Gas & Electric Company and Debtor PG&E Corporation, both collectively and individually as a single Debtor.

3. The terms "Fire" or "Fires" shall have the following meaning: the "2017 and 2018 Northern California Wildfires" defined and used by the Debtors in the Amended Declaration of Jason P. Wells in Support of First Day Motions and Related Relief (Dkt No. 263) filed on February 1, 2019.

4. The term "Cal Fire Report" shall mean the following reports issued by the California Department of Forestry and Fire Protection ("Cal Fire"), including the statements, findings, and conclusions within those reports, as well as the statements, findings, and conclusions within any attachments to those reports:

- a. Cal Fire Investigation Report, Case No. 17CAMRN0002957 (37)
- b. Cal Fire Investigation Report, Case No. 17CALNU010050 (Adobe)
- c. Cal Fire Investigation Report, Case No. 17CALNU010046 (Atlas)
- d. Cal Fire Investigation Report, Case No. 17CAHUU008828 (Blue)
- e. Cal Fire Investigation Report, Case No. 17CANEU026269 (Cascade)
- f. Cal Fire Investigation Report, Case No. 17CABTU015933 (Cherokee)

- g. Cal Fire Investigation Report, Case No. 17CABTU015954 (La Porte)
- h. Cal Fire Investigation Report, Case No. 17CALNU010142 (Norrbon)
- i. Cal Fire Investigation Report, Case No. 17CALNU010049 (Nuns)
- j. Cal Fire Investigation Report, Case No. 17CALNU010051 (Partrick)
- k. Cal Fire Investigation Report, Case No. 17CALNU010057 (Pocket)
- l. Cal Fire Investigation Report, Case No. 17CATCU012170 (Point)
- m. Cal Fire Investigation Report, Case No. 17CALNU010348 (Pythian)
- n. Cal Fire Investigation Report, Case No. 17CAMEU012169 (Redwood)
- o. Cal Fire Investigation Report, Case No. 17CALNU010055 (Sulphur)
- p. Cal Fire Investigation Report, Case No. 17CALNU010045 (Tubbs)
- q. Cal Fire Investigation Report, Case No. 17CALNU010487 (Youngs)

5. The term “CPUC Incident Investigation Report” shall mean the following reports issued by the California Public Utilities Commission (“CPUC”) including the statements, findings, conclusions within those reports, as well as the statements, findings, and conclusions within any attachments to those reports:

- a. CPUC Incident Investigation Report, No. E20171010-02, Apr. 29, 2019 (Adobe)
- b. CPUC Incident Investigation Report, No. 171023-8596, May 2, 2019 (Atlas 1)
- c. CPUC Incident Investigation Report, No. 171020-8589, May 2, 2019 (Atlas 2)
- d. CPUC Incident Investigation Report, No. E20171020-06, May 6, 2019 (Cascade)
- e. CPUC Incident Investigation Report, No. E20171010-01, May 2, 2019 (Cherokee)
- f. CPUC Incident Investigation Report, No. E20171013-01, Apr. 29, 2019 (La Porte)
- g. CPUC Incident Investigation Report, No. E20171020-05, May 10, 2019 (Norrbon)
- h. CPUC Incident Investigation Report, No. E20171016-01, Apr. 30, 2019 (Nuns)
- i. CPUC Incident Investigation Report, No. E20171020-02, May 10, 2019 (Partrick)
- j. CPUC Incident Investigation Report, No. E20171021-01, May 10, 2019 (Pocket)
- k. CPUC Incident Investigation Report, No. E20171009-03, Apr. 26, 2019 (Point)
- l. CPUC Incident Investigation Report, No. E20171020-03, May 1, 2019 (Pythian)
- m. CPUC Incident Investigation Report, No. E20171009-02, May 3, 2019 (Redwood)
- n. CPUC Incident Investigation Report, No. E20171011-02, May 10, 2019 (Sulphur)
- o. CPUC Incident Investigation Report, No. E20171026-01, May 13, 2019 (Tubbs)
- p. CPUC Incident Investigation Report, No. E20171020-01, May 6, 2019 (Youngs)

6. To the extent you consider any of the following requests or interrogatories objectionable, respond to so much of each, and each part thereof, which is not objectionable in your view, and separately state that part of each which is objectionable and the ground for each objection.

7. Provide a privilege log relating to Your responses to each of these Interrogatories and all supporting documents, from which You are withholding information. The privilege log must list the document or information withheld and the legal basis for withholding that information.

INTERROGATORY NO. 1:

If You contest any of the statements, findings, or conclusions of any Cal Fire Report or any CPUC Incident Investigation Report pertaining to any of the Fires, identify separately for each Fire:

- a. The factual basis for Your contention; and
- b. The legal basis for Your contention.

INTERROGATORY NO. 2:

To the extent You contend You are not legally liable for any of the Fires, state the following:

- a. For each Fire, state separately all affirmative defenses upon which You intend to rely to support Your contention;
- b. For each Fire, state separately the legal basis for Your contention that You are not legally liable for that Fire;
- c. For each Fire, state separately the factual basis for Your contention that You are not legally liable for that Fire;
- d. For each Fire, identify separately all witnesses that support Your contention that You are not legally liable for that Fire;
- e. For each Fire, identify separately all physical evidence that supports Your contention that You are not legally liable for that Fire; and
- f. For each Fire, identify separately all documents (listed by Bates Number) that support Your contention that You are not legally liable for that Fire.

Dated: August 22, 2019

BAKER & HOSTETLER LLP

By: /s/ Robert Julian
Robert Julian

*Counsel to the Official Committee of Tort
Claimants*